

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES)	CRIMINAL NO. 05-10213-NMG
)	
V.)	VIOLATION:
)	
GEORGE L. MEDINA)	18 U.S.C. § 922(g)(1)
a/k/a JORGE L. MEDINA)	Unlawful Possession of
)	Ammunition by a
)	Felon

JOINT MEMORANDUM FOR FINAL STATUS
CONFERENCE

The United States and counsel for defendant Paradise file this joint memorandum pursuant to Local Rule 116.5(C) and state as follows:

- (1) There is one outstanding discovery issue, pertaining to some photographs the parties took on a government camera of the house in Haverhill where the defendant was arrested. These photographs will be provided to counsel for the defendant by February 10, 2006.
- (2) The parties do not anticipate providing additional discovery.
- (3) The defendant does not intend to raise a defense of insanity or public authority.
- (4) The defendant is not asserting an alibi.
- (5) The defense anticipates filing motions that would require a ruling by the District Court.
- (6) The parties request an initial motion date of April 3, 2006.

- (7) At this time, the parties anticipate that this case will go to trial.
- (8) The parties agree that the following periods of time are excludable for purposes of the Speedy Trial Act:
- September 22, 2005, until October 20, 2005, pursuant to 18 U.S.C. § 3161 (h)(8)(A) and L.R. 112.2(A)(2)
 - November 2, 2005, until December 1, 2005, pursuant to this Court's order dated November 8, 2005.
 - December 1, 2005, until January 4, 2006, pursuant to this Court's order dated December 2, 2005
 - January 4, 2006, until February 6, 2006, pursuant to this Court's order dated January 5, 2006.
 - February 6, 2006, until April 3, 2006, pursuant to 18 U.S.C. § (h)(1)(F) and (h)(8)(A).

The parties agree that the defendant must be tried within 58 days, for purposes of the Speedy Trial Act.

- (9) The parties estimate any trial in this case will last approximately 2 to 3 days.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ S. Waqar Hasib
S. WAQAR HASIB
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